

**New Hampshire Special Education
Program Approval Report**

SAU # 18

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**Final Report
June 19, 1998**

**Visit Conducted on:
March 10 and 11, 1998**

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(Commendations, Citations, and Suggestions for Each School)

Note: It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The district is not mandated to implement them.

New Hampshire Special Education Program Approval Report

SAU # 18 Franklin / Hill

I. INTRODUCTION:

A New Hampshire Department of Education Special Education Program Approval visit was conducted at SAU # 18 comprised of the following schools: Jennie D. Blake Elementary School, Paul A. Smith Elementary School, Bessie C. Rowell Elementary School, Franklin Middle School and Franklin High School. The visiting team met on March 10 and 11, 1998 in order to review the status of Special Education services being provided to eligible students.

Activities related to this evaluation included the close review of all the teaching certifications of special education staff, analysis of SPEDIS data and random inspection of student records. Interviews were held with the special education director, building principals, regular and special education teachers, related service personnel and administrators as time and availability permitted. In addition, the team conducted parent interviews via phone. Throughout the visit the team had full cooperation from the schools' personnel and this helpfulness was greatly appreciated.

The report that you are about to read represents the consensus of all the members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the N.H. State Standards have been addressed. If a component is not mentioned, that does not mean that the team did not review it; it just means that there were no citations of noncompliance to the Standards found in that particular area.

II. STATUS OF PREVIOUS ON-SITE: *Conducted on February 9 - 10, 1993*

Based on review of the previous program approval report and the findings of the team that visited all schools within SAU #18 in March 1998, it was the consensus that the Franklin/Hill school district continues to lack system-wide improvements since the on-site evaluation of 1993. In comparing the citations and recommendations outlined in the 1993 report with present program operations, the visiting team found that many issues of noncompliance have not been addressed. Corrections, when made, were often isolated to a single location and were seldom addressed on an SAU-wide basis.

If the reader uses the SAU#18 on-site evaluation report from 1993 as a base for the 1998 review visit, it is evident that continued compliance problems are found in the following areas:

1. Staff Certification: Not all special education instructional staff and related service personnel hold appropriate certification. It should be mentioned that uncertified staff members are enrolled in programs and are making progress toward certification as required. Experienced supervision and role modeling are not available to assist in the development of effective practices.
2. Identification and Programming for the population of students with emotional disabilities: The need continues to exist for fully developed programming for students with emotional disabilities particularly at the high school level.

II. STATUS OF PREVIOUS ON-SITE: (contd.)

3. Clerical support and assistance for special education staff in each building is not adequate and much of the clerical work falls to the special education staff. This results in less time available for provision of services to students.
4. Writing of IEPs: Despite adoption of a new IEP format, IEPs continue to be weak in content and less well developed than should be expected. There is little evidence of any on-going significant staff training in regards to the writing and implementation of IEPs.
5. At the elementary schools there is a lack of consistent SAU-wide special education procedures. A new special education procedures manual has been developed, yet there continues to be a significant number of inconsistencies, errors and omissions in student records.
6. The high degree of staff turnover has likely had a role in the omissions and oversights found in the elementary schools' records. A lack of continuity and experience among special education staff contributes to inconsistencies and deficiencies in implementing procedures.

In summary, it is the opinion of the visiting team that there has not been significant progress in addressing compliance problems, which have been documented over the past five years. Collectively, the SAU's inability to deal with some basic compliance issues significantly impedes and offsets progress that has been made in other areas as noted in the commendations in the report that follows.

III. ISSUES OF SIGNIFICANCE

In order to accomplish the many aspects of this special education program approval evaluation, the visiting team was assigned to each of the schools in SAU# 18. At the end of each day the entire team met to discuss the findings and to develop a system-wide profile and compliance review for the Franklin/Hill special education programs.

As the visiting team carried out its duties, several issues of significance surfaced. Despite attempts made to rectify citations from the previous on-site visitation, there continues to be a lack of system-wide improvements in problem areas that were documented in 1993. This situation is unfortunate for students with disabilities who are attending the schools in SAU# 18. Issues of significance identified by the 1998 visiting team are listed as follows:

1. Qualifications of Service Providers: In accordance with rules established by the NH State Board of Education, teachers employed in SAU #18 must have NH certification appropriate for the educational disabilities of the students served.
2. Staffing patterns: There is a critical need for the SAU to look at present staffing patterns. The SAU needs to ensure that staffing patterns are adequate to provide for the range of educational needs of the students with educational disabilities.

III. ISSUES OF SIGNIFICANCE: (contd.)

3. Related Services: Related services in the area of occupational therapy are currently not available at the middle and high school levels due to a vacant position.
4. Role of Para-Professional & Special Educators: Special education staff (both professional and para-professional) are being used as substitute teachers to provide coverage in classrooms when substitutes are not available. Para-professionals are also used as necessary to cover clerical positions, which takes them away from their assigned duties with children.
5. Professional Development: There is a need for formalized inservice training to familiarize staff with special education policy and procedure, state and federal special education regulations, modifying and adapting curriculum and general inclusionary practices. The Department of Education makes such training available upon request.
6. Clerical Support: The team saw a very dedicated special education staff who are reportedly devoting up to 50% of their time on paperwork. It was the consensus of the team that this is unreasonable and, combined with the high number of caseloads most special educators carry, it is having a negative impact upon student programming and significant implications on time available for direct services and implementation of IEPs.
7. Facilities: While not unique to Special Education and the delivery of educational services to students with disabilities, the visiting team expressed concern that classrooms and instructional areas at the high school are in need of maintenance and are not adequate to accommodate the implementation IEPs. Specifically noted during the visit were banging pipes, window shades that did not work and a facility that was not well maintained, which significantly interferes with the learning process and the ability to conduct learning activities necessary to meet the needs of students with disabilities. The team also raised concern that the Jennie Blake School is not handicapped accessible and there is no plan in place to address this issue.
8. Continuum of Services: There is no apparent long-range plan in place that begins to address the growing needs of the special education student population. Currently SAU#18 is not able to provide a fully developed continuum of services required to meet the needs of students with disabilities; this is especially evident at the high school level. Throughout the SAU, a significant number of other unidentified students are considered at-risk by school staff and in many cases, students are provided support without formal special education identification or they are provided accommodations through 504 Plans. The significant support many of the students require impacts on the present staff (regular and special education) and on the educational services available for all of the student population. Extending the responsibilities of special education staff beyond already-heavy caseloads can impair the delivery of special education services to students with disabilities. Attending to the implementation of IEPs, i.e. providing an appropriate education, must be the first priority of Special Education staff.

III. ISSUES OF SIGNIFICANCE: (contd.)

9. **SPEDIS:** There is a discrepancy in the numbers of students reported as having an educational disability. Specifically, the numbers reported through the SPEDIS data bank reflect a lower number of students than the numbers reported in the Application for Approval of District Special Education packet submitted by the SAU. The number of identified students reported by building level staff reflect yet another figure. While the identified population is never static there is a need to clarify the numbers of students eligible for special education services as the district attempts to meet the staffing, programming and procedural requirements.

Overall, it was the consensus of the visiting team that there is an immediate need to improve and refine all existing special education practices in SAU#18. SAU#18 needs to outline a plan to upgrade their record keeping procedures, provide on-going professional development opportunities, clarify their direction and vision for special services, take a critical look at necessary staffing patterns and plan for future staffing needs, ensure that all staff have appropriate certification and that all programs meet full compliance with state and federal special education regulations.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS:

SAU WIDE

Name of Program(s) Visited: All

COMMENDATIONS:

- The limited resources available in SAU #18 present a significant challenge to all staff as they work to provide an adequate education for all students. The staff is commended for their hard work and serious effort.
- The administration is commended for their efforts toward supporting new staff in seeking appropriate professional certification.
- The proposed use of the state special education model forms is a positive move toward providing a format that will offer district-wide consistency in the area of special education procedure.

CITATIONS: (in numerical order)

Ed # 1119.07 (a) Qualification of Service Providers
A significant number of special education service providers presently lack the New Hampshire certification appropriate for the educational disability/disabilities of the students they are serving.

Ed # 1119.07 (c) (3) Paraprofessionals
It is reported throughout the SAU that para-professional staff are asked to assume the responsibilities of teacher/substitute teacher.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: (contd.)

Ed # 1119.03(b)

Curricula

Through staff interviews it became apparent that the district does not fully address the issue of providing modifications to the curricula to meet the unique needs of students with disabilities. This is evident in the lack of district-wide inservice training for all staff, as well as in the inability of the limited number of special education staff to provide support to students with disabilities in the regular classroom. This includes the district's responsibility to:

- Adapt or modify instructional materials.
- Adapt, modify, or use alternative teaching methods.

Ed # 1119.01 (4)

Programming in Regular Class Environments

The district has not provided in-service training for the regular teacher, relative to the inclusion model.

Ed # 1119.04 (a)

Equipment, Materials and Assistive Technology

While not unique to Special Education and the delivery of educational services to students with disabilities, the visiting team expressed concern that the district lacks adequate materials, including technology, to fully implement the individualized education programs for all of the SAU's students with educational disabilities.

Ed # 1107.02(a- g)

Process

At the elementary schools, the visiting team identified a significant number of omissions and oversights in the special education process.

SUGGESTIONS:

- SAU 18 needs to take a critical look at the impact of the high rate of staff turnover on the consistency and quality of educational services provided to the students with disabilities. A plan should be developed to address this critical issue.
- Including students with disabilities in regular education classrooms requires regular and ongoing training for all staff (professional and para-professional). This includes training in special education policy and procedure, and knowledge of inclusionary practices, among other areas. The Department of Education makes such training available upon request.
- SAU #18 should assure that a full continuum of educational services is available to all special education students. The present staffing structure is very limited and does not provide the opportunity for special education services to be delivered through the full array of program options, particularly in the area of classroom support.
- Special education staff should not be regularly used to "fill in" for absent staff. The special education provider's role is as vital to the educational process of each school as any other educator and should be regarded equally.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS (contd.)

- The visiting team strongly suggests that SAU #18 review the physical condition of the district's school buildings to assess the need for critical renovations, maintenance and, at the Jennie D. Blake School, handicapped accessibility.
- The SAU should take a close look at the numbers of students requiring support through the formalized special education and 504 processes, as well as those students considered by staff to be at-risk. The impact that the reportedly very high number of such students makes on all educational services within a school district is significant and should be fully considered in all aspects of planning and programming.

Paul A. Smith Elementary School

Program(s) Visited: Preschool

Commendations :

- The staff of the preschool program are friendly, helpful and dedicated.
- The classroom environment is pleasant and conducive to learning.
- The district program for early intervention provides for integration of preschool students with disabilities with non-disabled peers.

Citations :

<u>Ed # 1107.07(c)</u>	2 files: LEA representative on SEE/PT team determining disability was not designated.
<u>Ed # 1109.01(g)</u>	1 file: IEP did not indicate date and duration of services.
<u>Ed # 1109.01(j)</u>	1 file: IEP did not list service providers responsible for implementing the IEP.
<u>Ed # 1109.03(b-1)</u>	1 file: LEA representative not designated at IEP meeting.
<u>Ed # 1111.01</u>	1 file did not contain evidence that Extended School Year programming was considered.
<u>Ed # 1115.03(a)</u>	1 file: LEA representative not designated at placement team meeting.
<u>Ed # 1125.03</u>	2 files: evidence of written prior notice not present.

Suggestions:

- Although the Director of Special Education is responsible for the supervision of the teaching staff and the case managers of the preschool and kindergarten programs, it is suggested that these staff members become certified in general special education as soon as possible.
- The staff at Paul A. Smith School might want to consider the development of a more user-friendly format for organization of student files.
- Special education staff need support for paperwork/administrative tasks to allow more time to provide direct services to students and supervision of assistants.
- Training should be offered to the staff relative to the district's special education policies and procedures.

Paul A. Smith Elementary School

Program(s) Visited: K-2 Special Education

Commendations :

- Special education staff are very positive, hard working and dedicated to students.
- All staff are supportive of one another and work well as a team to meet the needs of all children.
- The entire school is making a strong effort in the area of literacy.
- Staff make good efforts to include parents in the special education process.

Citations:

<u>Ed # 1107.07(c)</u>	2 files did not contain evidence of LEA representative at meeting.
<u>Ed # 1125.03(a-d)</u>	2 files: Written prior notice was either incomplete or missing.
<u>Ed # 1123.14(a-10)</u>	1 file did not contain record of disclosure.
<u>Ed #1107.08(c)</u>	2 files did not contain evidence of classroom observation.
<u>Ed # 1109.01(b)</u>	1 file: I.E.P did not contain statement of annual goals or objectives
<u>Ed # 1109.01(j)</u>	1 file: I.E.P did not contain a list of service providers.
<u>Ed # 1109.04(a)</u>	2 files did not contain evidence of 10 day notice to parent.
<u>Ed # 1107.05(k)</u>	1 file: Evaluation not completed within 45 days. Extensions signed, but evaluation took from 3/97 to 12/97.
<u>Ed # 1111.01</u>	2 files did not contain evidence that Extended School Year programming was considered.
<u>Ed. # 1109.02</u>	1 file: IEP was not written within 30 days.
<u>Ed. # 1119.07</u>	Para-professionals and special education staff asked to assume responsibilities of substitute teachers and clerical staff resulting in a lack of delivery of services to students with disabilities.
<u>Ed#1119.07</u>	Not all staff have NH certification appropriate for the educational disabilities of the students they serve.

Paul A. Smith Elementary School, Contd.

Suggestions:

- Develop a consistent and formal format for team meeting minutes. Minutes were missing or incomplete in all files reviewed.
- Files were lacking in consistency and good organization. SAU-wide adoption of the model forms, coupled with staff training in the area of information management is recommended. Technical assistance is available through the Department of Education upon request.
- Staff expressed concern about the use of special education teachers in the school-wide literacy program. The Paul A. Smith School needs to take a critical look at how the literacy program limits the special education teachers' ability to provide services to all special education students.
- Special education teachers report a backlog of evaluations and don't seem to have time to complete evaluations in a timely fashion. A discussion to assess the district-wide need for diagnostic evaluations may be helpful in identifying critical areas of need regarding staffing patterns.
- The staff should consider implementing a pre-referral process (Teacher Assistance Team) that may help address the significantly high number of referrals to special education. Training in this area is available through the Department of Education upon request.
- Special education staff (professional and paraprofessional) should not be taken from their responsibilities to fill in for absent staff.

Jennie D. Blake Elementary School

Program(s) Visited: Regular Education Classroom with Modifications

Commendations ::

- The staff are supportive, enthusiastic and dedicated.
- Special and regular education staff communicate and work well together.
- The school has a "homey" atmosphere and pleasant environment.

Citations :

<u>Ed # 1107.02(b,d)</u>	1 file did not contain referral. 1 file contained an undated referral. 2 files did not contain evidence that referral meeting was held.
<u>Ed # 1107.05(k)</u>	1 file: evaluation was not completed within agreed extension time and no additional extension was evident.
<u>Ed # 1107.07(c)</u>	2 files did not contain evidence of designated LEA representative on evaluation team.
<u>Ed # 1107.08(c,d)</u>	1 file did not contain evidence of classroom observation. 1 file did not contain evidence that testing was done by certified educator. 1 file contained LD evaluation summary, but was signed only by the classroom teacher.
<u>Ed # 1109.03(b,1)</u>	1 file did not contain evidence of LEA representative at IEP development team meeting.
<u>Ed # 1109.04</u>	1 file did not contain 10-day written notification to parent of IEP meeting.
<u>Ed # 1111.01</u>	1 file: IEP indicated student eligible for Extended School Year programming, but did not contain evidence of participation in any program or goals, objectives or monitoring of progress.
<u>Ed # 1115.03(a)</u>	1 file did not contain evidence of LEA representative at placement team meeting.
<u>Ed # 1125.03</u>	1 file did not contain written prior notice or meeting minutes.
<u>Ed. # 1119.06(a)</u>	The building is not handicapped accessible.

Suggestions:

- There is a need for more consistency in the use of forms and in the organization of files.
- The SAU needs to take a critical look at space issues and at the crowded conditions within the classroom. The use of hallway space to accommodate small-group and tutorial instruction is a strong indicator of space deficits.
- Ongoing transition planning is encouraged as students move from this small community school to the Middle School in an effort to provide consistency in programming and improve communication.

Program(s) Visited: Modified Regular

Commendations ::

- Education and support staff were helpful and friendly.
- Students were friendly and polite.
- The building is colorful and airy with students' work prominently displayed
- OT and SP staff are seen as positive and thorough and work well with students.
- Parents are complimentary of staff and programs and communication with the school.
- Staff work very hard to meet the needs of multiple students and in keeping the records as organized as possible.

Citations:

<u>Ed #1107.02(b)</u>	1 file did not contain written prior notice to parents of referral.
<u>Ed # 1107.02(d)</u>	1 file did not contain evidence of written notice of disposition.
<u>Ed # 1107.05(k)</u>	1 file: evaluation was not completed within 45 days and no signed extension was evident.
<u>Ed # 1109.11</u>	2 files did not contain evidence of regular and systematic monitoring of the IEP.
<u>Ed # 1111.01</u>	2 files did not contain evidence that Extended School Year programming was considered or completed by April 30 th .
<u>Ed # 1107.07(c,1)</u>	2 files did not contain evidence that teacher certified in area of suspected disability was in attendance at evaluation team meeting.
<u>Ed # 1107.07(c3)</u>	1 file did not contain evidence of LEA representative at evaluation team meeting.
<u>Ed # 1107.08(c)</u>	1 file did not contain evidence of classroom observation
<u>Ed # 1125.04(a,1)</u>	1 file did not contain evidence of written parental consent for pre-placement evaluations.

Ed # 1125.03

1 file did not contain evidence of written prior notice to parent.

Suggestions:

- Through interviews with staff it became evident that training would be helpful for all staff in the areas of inclusionary practices and behavioral programming.
- Caseloads for special education staff are large: 35-40 students at each grade level. These high caseloads result in excessive time spent on paperwork, which directly impacts on services to students with disabilities.
- Staff would like to see more parent involvement through initiatives such as a volunteer program.
- Communication and a lack of a transition system between schools within the districts was cited as a concern and should be addressed.

Franklin Middle School

Program(s) Visited: Special Education - Grades 7-8, Modified Regular Classroom

Commendations ::

- There is an enthusiastic staff at the Franklin Middle School.
- There is good use of common planning time for special and regular education staff.
- The principal is well informed and involved with staff and students.
- Parents interviewed expressed satisfaction with the staff and programs at Franklin Middle School.

Citations:

Ed # 1109.03 1 file: IEP reviewed had expired. IEP end date was 3/4/98, no extension in the file. On the following day there was a signed extension available.

Ed # 1107.02(b,d) 1 file did not contain referral form.

Ed#1119.04 The staff report that they lack appropriate instructional materials adequate to implement the Individualized Education Program for each student with educational disabilities.

Ed#1119.01 (4) There has not been adequate in-service training for the regular education teachers relative to the instruction of special education students in the mainstream.

Ed#1119.01 (3) There is not adequate staff or time available to fully provide consultative help for the regular teacher.

Ed#1119.07 Not all staff hold NH certification appropriate for the educational disabilities of the students they serve.

Suggestions:

- Certified staff are not in primary instruction positions with identified children. Their roles should be clearly defined.
- The numbers of identified students and caseloads for special education staff are very high. The special education staff spend a great deal of time managing paperwork and assessments and, as a result, have limited time available in which to service educationally students with disabilities. This impacts significantly on the quality of special education services delivered at the Middle School.

Franklin Middle School, Contd.

- The school staff and district administration should take a critical look at programming and staffing patterns available for all educationally students with disabilities (EH, LD, OH, etc.) at the Middle School to insure that a continuum of services is available for identified students.
- The middle school should consider the inclusion of regular education staff in the supported study program. This would encourage greater use of the learning center by regular education students and support integration and inclusion.
- Ongoing training for all staff on inclusionary practices and modification of materials in the regular classroom is strongly suggested.

Franklin High School

Program(s) Visited: Modified Regular, Learning Lab

Commendations ::

- Staff at Franklin High School are very caring and dedicated to all students.
- There is a continued effort for communication between regular and special education staff.
- Student records are well organized.

Citations:

<u>Ed # 1109.11</u>	1 file did not contain evidence of regular and systematic monitoring of the IEP.
<u>Ed # 1115.04</u>	The school does not provide evidence that a continuum of educational environments is available for all students with special education needs at Franklin High School
<u>E d# 1119.01(3)</u>	There is not enough special education staff available to provide an adequate amount of consultative help to the regular teacher.
<u>Ed # 1119.01(4)</u>	There is no evidence that inservice training related to the delivery of special education services is offered to regular education teachers.
<u>Ed # 1119.04</u>	There is a lack of appropriate instructional equipment and materials, including technology, adequate to implement the individualized education program for each student with educational disabilities.
<u>Ed # 1119.07</u>	Not all staff hold the NH certification appropriate for the educational disabilities of the students they serve.
<u>Ed # 1119.07 (b)(1)</u>	Not all paraprofessionals work under the supervision of an appropriately certified professional.
<u>Ed # 1119.07 (c)(3)</u>	Paraprofessionals are expected to assume the responsibilities of teacher/substitute teacher.

Suggestions:

- Provide for professional development opportunities for regular and special education teachers and teacher assistants, particularly in the area of implementation of the full inclusion model.
- There is a need for additional staff and substitutes.
- There is a need for additional computers, technology and training in this area.
- Some students may need more support in the full inclusion model.

ADDENDUM

JAMES O. MONITORING PROGRAM

SAU # 18

Student File Review

Case Study Document

Reimbursement Claim Form

Case Study Addendum Form

<p style="text-align: center;">ADDENDUM JAMES O. MONITORING PROGRAM</p>

SAU # 18

CITATIONS:

Ed #11130.03 1 file: There is no evidence that the team provided the court with a copy of a WPN five days prior to the hearing.

SUGGESTIONS:

No suggestions at this time. The out-of-district files were found to be in general good order.